

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN THE MATTER OF:

**JOSE M MELERO MUNOZ
MARIA V. BONNIN OROZCO.**

Debtor

CASE NO. 18-01951 (BKT)

CHAPTER 11

**JOINT MOTION TO WITHDRAW AND TO ASSUME LEGAL REPRESENTATION
OF JOSE MELERO MUNOZ & MARIA BONIN OROZCO**

TO THE HONORABLE COURT:

COMES NOW JOSE MELERO MUNOZ & MARIA BONIN OROZCO (the "Debtors"),
and very respectfully states and prays as follows:

On April 12, 2018, the Debtors filed a bankruptcy petition under the provisions of a Chapter 11 of the Bankruptcy Code. **See Dkt. No. 1.**

On May 3 2018, attorney Hector Figueroa Vincenty filed his application to employ professional. **See Dkt. No. 29.**

On June 6, 2018, September 17 2018, the Honorable Court granted attorney Vincenty's application for employment. **See Dkt. No. 71.**

On September 17 2018, the Honorable Court granted the debtors until October 10, 2018, to file a Disclosure Statement and Plan. **See Dkt. No. 92.**

Due to personal reasons, the Debtors have decided to change their legal representative. As a direct consequence of their decision, attorney Hector Figueroa is presenting a withdrawal of legal presentation and attorney Nelson Robles is assuming

legal representation of the Debtors. An application for employment will be filed within the next two working days.

Attorney Hector Figueroa will cooperate with attorney Nelson Robles to have a productive and smooth transition of legal representation, all in the benefit of the Debtors and the other parties in interest.

LBR 9013-1(h) Notice

Pursuant to LBR 9013-1(h), the Debtor provides the following notice:

Within fourteen (14) days after service as evidenced by the certification (plus an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail), any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico and serve a copy of the same on the undersigned. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

WHEREFORE, the Debtor requests that this Court enter an Order approving the withdrawal of legal representation by attorney Hector Figueroa Vincenty and to note that Nelson Robles-Diaz will assume legal representation as the Debtors' counsel, and the application for employment together with pertinent documents will be filed within the next two working days.

Dated: September 27, 2018

In San Juan, Puerto Rico

Respectfully submitted,

**JOSE MELERO MUNOZ & MARIA
BONIN OROZCO**

By: /s/ **JOSE MELERO MUNOZ &
MARIA BONIN OROZCO**

Prepared for the Debtor By:

NELSON ROBLES-DIAZ LAW OFFICES
PSC

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Proof of Service

The undersigned certifies that on even date herewith, she caused the above pleading to be served electronically (via ECF) on all parties having registered with the Court's ECF program in this case.

/s/ Nelson Robles- Diaz
Nelson Robles-Diaz